

Remarks

This Amendment is responsive to the Office Action of **July 8, 2005**. Reexamination and reconsideration of **claims 1-29** is respectfully requested.

Summary of The Office Action

Claims 1-16 and 19-26 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Claims 1, 3, 5, 10, 12-13, 19-23 and 25-26 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,697,609 (Williams et al.).

Claim 16 was rejected under 35 U.S.C. 103(a) as being unpatentable over the Williams patent.

Claims 2, 4, 9, 15 and 24 were rejected under 35 U.S.C. 103(a) as being unpatentable over the Williams et al. patent as applied to claims 1 and 19 above, and further in view of Japanese Publication No. 61-124459.

Claim 6, 11 and 14 was rejected under 35 U.S.C. 103(a) as being unpatentable over the Williams et al. patent as applied to claims 5, 10 and 13 above, and further in view of U.S. patent No. 4,717,027 (Laure et al.). U.S. Patent No. 5,893,037 to Reece et al.

Election/Restriction

Method claims 17, 18 and 27-29 have been withdrawn by the Examiner.

The Office Action explains that a braking mechanism can be used to perform the claimed process where such exemplary apparatus is materially different from the apparatus set forth in

claims 1-16 and 19-26. In particular, the Office Action states that the braking mechanism can hold a first portion of a sheet of media while the conveying mechanism rotates the sheet about the braking mechanism and into contact with the registration wall.

Applicant respectfully submits that the exemplary apparatus is not materially different from the claimed apparatus. The apparatus claims recite, for example, that the media carriers are operated at different speeds where the carriers that are closer to the registration wall have a slower speed. In effect, the slower speed is a braking mechanism relative to the faster media carriers and thus reads on the exemplary apparatus provided above. Therefore, Applicant respectfully submits that the restriction requirement is not appropriate in the present case and should be withdrawn.

The Present Amendment

A number of claims were rejected for insufficient antecedent basis. These rejections have been addressed in the present amendment and the rejections should now be overcome.

For example, claims 1 and 3 have been amended to correct the antecedents of the media carriers. Thus, the scope of claims 1 and 3 have not been changed. Claim 12 has been amended to correct the antecedents of the first media carrier and second media carrier. Thus, the scope of claim 12 has not been changed.

Regarding the rejection for claims 1, 12 and 19 for insufficient structure, Applicant respectfully submits that claims can be recited structurally or functionally (MPEP 2114). The present claims are recited using a combination of both structure and function and thus are valid. Also, there is no requirement that functional language must be associated with a term that is in means-plus-function form. The recited language is not indefinite since the recited functional language defines how the components are configured, which defines to one of ordinary skill in the art how to make the recited apparatus. This is especially true when the claims are read in light of the present specification. Therefore, Applicant respectfully requests the rejection for insufficient structure be withdrawn.

The Present Claims Patentably Distinguish Over the References of Record

Claims 1, 3, 5, 10, 12-13, 19-23 and 25-26 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,697,609 (Williams et al.).

Independent Claim 1

Williams teaches a system that is configured differently and operates differently than the media registration mechanism recited in claim 1. Williams, thus, fails to teach or suggest claim 1 for the following reasons.

The Office Action relies primarily on Figure 4 and column 8, lines 1-40 of Williams to teach claim 1. Looking to Williams, the patent teaches registration of a paper sheet at a datum 142 (see column 8, line 4, "...register the paper at datum 142..."). Datum 142 is a non-physical reference line, along which a leading edge sensor 126 is positioned. The Office Action refers to an object (near reference 132) in Figure 4 that is alleged to teach the claimed registration wall. Since registration is determined at the datum 142, the object (near 132) has no involvement in the registration process and thus, cannot be a registration wall. Furthermore, Williams does not mention the object (near 132) in any way thus any interpretation of what it is, if anything, would be purely speculation. There is no support from the disclosure of Williams to believe that it is even a wall at all.

Therefore, Williams fails to teach or suggest a registration wall and media carriers configured to cause the print media to rotate towards and align against the registration wall as recited in claim 1.

Additionally, Williams teaches a different and much more complicated registration system than that of claim 1. For example, Williams is configured to determine the position of every single sheet of paper and independently adjust its orientation along the datum 142. Column 8, lines 12-16 explain that each paper's lateral position and orientation is determined by edge sensors 132 and 134 and then states, "With this information, the registration controller can generate the velocity profiles for the registration at datum 142." The velocity profiles are used to

control the nips 114 and 116 to steer the paper to register it along datum 142 (column 8, lines 2-5). Thus, each sheet could have a different orientation and require the nips 114 and 116 to be reconfigured for each sheet to properly orient the sheet along the datum 142.

With the registration mechanism of claim 1, the orientation of individual sheets do not impact the mechanism since it is configured to align sheets against the registration wall. Therefore, claim 1 is not taught or suggested by Williams and claim 1 patentably distinguishes over the references of record and is in condition for allowance.

Accordingly, dependent claims 2-9 also patentably distinguish over the references of record and are in condition for allowance.

Independent Claim 10

Claim 10 recites a media steering mechanism that comprises a fence, a plurality of media carriers, and a drive mechanism for driving each of the media carriers such that the sheet of media is steered towards the fence to cause an edge of the sheet of media to contact and align against the fence.

Based on the previous discussion of Williams, Williams fails to teach or suggest a fence or media carriers that steer media toward the fence to cause an edge of the sheet of media to contact and align against the fence. Rather, Williams uses sensors to detect the orientation of a sheet of paper and registers the paper along a datum 142. The datum 142 is a non-physical reference line and thus is not a fence that a sheet can contact and align against.

Since claim 10 recites features not taught or suggested by Williams, claim 10 patentably distinguishes over the reference. Accordingly, dependent claim 11 also patentably distinguishes over the reference and is in condition for allowance.

Independent Claims 12 and 19

In view of the teachings of Williams as explained above, Applicant respectfully submits that Williams fails to teach or suggest the recited elements of claims 12 or 19, respectively. Applicant respectfully submits that claims 12 and 19 patentably distinguish over the references of record and are in condition for allowance.

§103 Rejection Based on Williams and Japanese Publication No. 61-124459

Claims 2, 4, 9, 15 and 24 were rejected under 35 U.S.C. §103(a) as being unpatentable over the Williams et al. patent as applied to claims 1 and 19 above, and further in view of Japanese Publication No. 61-124459.

Although JP 61-124459 shows belts for correcting the inclination angle of paper money, it fails to teach or suggest aligning the money against a registration wall. JP 61-124459 teaches the use of photosensors to detect the inclination of the money. The money is moved freely without aligning against a registration wall. This is similar Williams, which uses sensors to determine the orientation of paper. Thus, JP 61-124459 fails to cure the short comings of Williams and a combination of Williams and JP 61-124459 still fails to teach or suggest the present claims.

Dependent Claim § 103 Rejections

Claims 6, 11, 14 and 16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams or Williams in view of Laure. As claims 6, 11, 14 and 16 depend from independent claims that patentably distinguish over the references of record, the arguments above apply equally to these claims. Accordingly, dependent claims 6, 11, 14 and 16 patentably distinguish over the references of record and are in condition for allowance.


The references cited but not applied have been considered and do not teach or suggest the recited features of the respective claims, individually or in combination with each other. Therefore, all claims are in condition for allowance.

Conclusion

For the reasons set forth above, **claims 1-29** patentably and unobviously distinguish over the references of record and are now in condition for allowance. An early allowance of all claims is earnestly solicited.

OCT. 11, 2005

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Petar Kraguljac", is written over a horizontal line.

PETAR KRAGULJAC (Reg. No. 38,520)

(216) 348-5843